

IN THE UNITED STATES DISTRICT COURT
DISTRICT OF SOUTH CAROLINA
GREENVILLE DIVISION

Carolyn Anderson, Duly Appointed)	C.A. No. 6:15-cv-3259-GRA-KFM
Guardian Ad Litem for Tario Eugene)	
Anderson, and in her individual capacity,)	
)	
Plaintiffs,)	
v.)	DEFENDANTS' LOCAL RULE
)	26.01 INTERROGATORIES
The City of Greenville, the City of)	
Greenville Police Department, Ken Miller,)	
in his Individual Capacity and Official)	
Capacity as Chief of the Greenville City)	
Police Department, Ryan Weeks and)	
Anthony Collier, in their Individual and)	
Official Capacity as Police Officers of the)	
City of Greenville, and John Doe,)	
representing an Officer/Officers who will be)	
specifically named later once their identities)	
are known after discovery is complete,)	
)	
)	
Defendants.)	
)	

(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of said interest.

RESPONSE: None to the knowledge of the Defendants.

(B) As to each claim, state whether it should be tried jury or nonjury and why.

RESPONSE: The Defendants request a jury trial as the causes of action and matters set forth in the Complaint are appropriate for a jury.

(C) State whether the party submitting these responses is a publicly owned company and separately identify: (1) each publicly owned company of which it is a parent, subsidiary, partner, or affiliate; (2) each publicly owned company which owns ten percent or more of the outstanding shares or other indicia of ownership of the party; and (3) each publicly owned company in which the party owns ten percent or more of the outstanding shares.

RESPONSE: Defendants are not a publicly owned company.

(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division). See Local Civil Rule 3.01.

RESPONSE: Plaintiffs have sued Defendants alleging violation(s) of federal law that fall within the jurisdiction of this Court pursuant to 28 U.S.C. § 1331

- (E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; and (3) a statement of the status of the related action. Counsel should disclose any cases which may be related regardless of whether they are still pending. Whether cases are related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings, or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.

RESPONSE: This action is not related to any other matter filed in this District.

- (F) [Defendants only.] If the defendant is improperly identified, give the proper identification and state whether counsel will accept service of an amended summons and pleading reflecting the correct identification.

RESPONSE: Defendants are properly identified.

- (G) [Defendants only.] If you contend that some other person or legal entity is, in whole or in part, liable to you or the party asserting a claim against you in this matter, identify such person or entity and describe the basis of said liability.

RESPONSE: None known at this time.

Respectfully submitted,

ROE CASSIDY COATES & PRICE, P.A.



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